

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

STUDENTS FOR JUSTICE IN
PALESTINE, AT THE UNIVERSITY OF
HOUSTON *et al.*,

Plaintiffs,

v.

Case No. 1:24-cv-00523

GREG ABBOTT *et al.*,

Defendants.

**BRIEF OF MIDDLE EAST FORUM AS *AMICUS CURIAE* IN SUPPORT OF
DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION
FOR A PRELIMINARY INJUNCTION**

CORPORATE DISCLOSURE STATEMENT

Counsel for *amicus curiae*, Middle East Forum (MEF), certifies that *amicus curiae* has no parent corporation and no publicly held corporation owns 10% or more of any stock in MEF.

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INTEREST OF AMICUS

MEF is a think tank that promotes American interests in the Middle East and works to protect Western values from Middle Eastern foreign threats. One of MEF's projects, Campus Watch, is focused, among other things on reviewing and critiquing the intellectual roots of bias in Middle East studies programs on American college campuses. MEF's Islamist Watch Project exposes the impact of domestic lawful Islamist networks, in part by tracking outside hostile and terrorist forces seeking to infiltrate and influence domestic institutions and organizations, including schools and universities. The proper resolution of this case is a matter of utmost concern to MEF because it touches on not only MEF's core mission, but its aims as they relate to universities and society at large. Given MEF's expertise as stated above, the focus of this Amicus Brief is limited to providing the Court with a more comprehensive understanding of why Executive Order No. GA-44 ("**Executive Order**") is necessary, appropriate, and the least restrictive means of serving a compelling government interest: protecting public universities from outside forces, including terrorist organizations and nation-state proxies, that misuse school and community organizations to foment chaos and hijack institutions, promoting anti-Semitic activity under the misapplied cloak of the First Amendment. By enacting GA-44, Texas has sought to adopt a uniform definition of anti-Semitism, and thereby to strengthen its ability to protect its Jewish students from anti-Semitism, via an established definition that can serve as a guidepost to prevent inappropriate discrimination in violation of Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*

ARGUMENT

1. Students for Justice in Palestine (SJP) is a network of anti-Israel student organizations across the United States. SJP's reach has grown considerably since its establishment over 20 years ago, after additional branches were established in dozens of universities in the 2000s. In 2010, SJP launched a national coordinating body, named the National Students for Justice in Palestine (NSJP), which later secured 501(c) status.¹ The formation of NSJP was the result of a conference organized by American Muslims for Palestine and the U.S. Palestinian Community Network,² along with several other activist organizations.³

2. A more formalized system appeared to help with SJP's expansion. Today, the network comprises branches in almost 200 college campuses across the United States. These branches operate under a variety of names, using both the SJP label as well as names such as the Palestine Solidarity Committee. These SJP chapters are believed to be under the direct control of NSJP. At the very least, there is broad coordination between NSJP and SJP Chapters. There also likely is coordination with other organizations belonging to certain Islamist whose interests are not to promote the ideas of moderate Islam, but rather to foment chaos and hijack colleges and universities by creating an atmosphere of hostility, intimidation and other anti-Semitic conduct in violation of Title VI of the Civil Rights Act of 1964.

3. One of SJP's most prominent and dangerous partners is American Muslims for Palestine (AMP). Not only do SJP and AMP share officials, but, as the *Forward* points out, "SJP

¹ Students for Justice in Palestine National Convention 2010, June 23, 2010.

<https://web.archive.org/web/20101120221537/http://ussf.palestineconference.org/sjp-national-conference/>

² USPN Letter about the US Social Forum, USSF Website, 2010.

<https://web.archive.org/web/20120314231916/http://ussf.palestineconference.org/uploads/fundraising-letter.pdf>

³ *Parizer v. AJP Educational Foundation, Inc.*, No. 1:24-cv-00725-RDA-IDD, [Doc. 24, ¶ 60-63] (E.D. Va. July 9, 2024) (*Parizer v. AMP*); Charles Asher Small et al., *Antisemitic Violent Extremism and the Threat to North American Universities: The Contextualization of the National Students for Justice in Palestine*, Institute for the Study of Global Antisemitism and Policy, at 12 (Oct. 2019).

<https://isgap.org/wp-content/uploads/2019/10/NSJP-2019-ISGAP-Report-Long-Version.pdf>.

campus chapters are encouraged to reach out to American Muslims for Palestine (AMP) to trade strategies and get non-students to attend student government meetings about divestment.”⁴ AMP also provides funding to foment campus chaos. As noted by Jonathan Schanzer of the Foundation for Defense of Democracies, photographs on social media reveal AMP officials having no affiliation or ties to particular universities handing checks to various SJP chapters.⁵

4. Hatem Bazian founded the inaugural SJP branch at the University of California, Berkeley, in 2001. Bazian is also a co-founder of AMP, which media and legislators have long accused of serving as the chief pro-Hamas voice in the United States.⁶ AMP, which also operates under the name AJP Educational Foundation, and operates a 501(c)(4) organization named AJP Action, is widely and credibly believed to serve as successor to the Islamic Association of Palestine, a now defunct organization implicated in a major Hamas fundraising network uncovered by the notorious 2007 Holy Land Foundation terrorism trial.⁷

5. The Anti-Defamation League (ADL) explains: “AMP has its organizational roots in the Islamic Association of Palestine (IAP), an anti-Semitic group that served as the main propaganda arm for Hamas in the United States until it was dissolved in 2004. Since its creation in 2005, AMP continues to work closely with some former IAP leaders who currently hold positions as AMP board members.”⁸

⁴ Max Samarov, “Students For Justice In Palestine Relies On A Network Of Hate,” *The Forward*, January 30, 2018. <https://forward.com/community/393199/students-for-justice-in-palestine-relies-on-a-network-of-hate/>

⁵ Jonathan Schanzer Twitter Post, May 5, 2024. <https://twitter.com/JSchanzer/status/1787117408831901984>

⁶ *Parizer v. AMP*, ¶ 42-43; “Comer Presses American Muslims for Palestine to Produce Requested Information Related to the Funding of Illegal, Pro-Hamas Activities,” Committee on Oversight, U.S. Congress, June 24, 2024. <https://oversight.house.gov/release/comer-presses-american-muslims-for-palestine-to-produce-requested-information-related-to-the-funding-of-illegal-pro-hamas-activities-%EF%BF%BC/>

⁷ Jonathan Schanzer, “From Ivory Towers to Dark Corners: Investigating the Nexus Between Antisemitism, Tax-Exempt Universities, and Terror Financing,” Ways and Means Committee Testimony, November 15, 2023. <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf>

⁸ “Students for Justice in Palestine (SJP),” Anti-Defamation League, October 19, 2023. <https://www.adl.org/resources/backgrounder/students-justice-palestine-sjp; see also Parizer v. AMP, ¶ 19-63.>

6. National Students for Justice in Palestine (NSJP) is not solely under the influence of AMP, however. Indeed, the NSJP appears closely tied to several other organizations from separate but ideologically related ideological networks whose agenda crosses beyond protectible free speech and into the realm of anti-Semitism.

7. The Westchester Peace Action Committee (WESPAC) Foundation, for instance, serves as the fiscal sponsor for NSJP (as well as other radical activist organizations).⁹ See Appendix I. WESPAC is not just financier, but also conducts activism efforts, campaigning for terrorists convicted in Israel; and, after October 7, publishing justification for the massacre perpetrated by an organization (Hamas) branded by the United States as a terrorist organization, suggesting as a basis the “context” of Israeli “apartheid.”¹⁰

8. On campus, NSJP also encourages various “Palestine solidarity” organizations to solicit support not solely from NSJP, but from the “Campus Support Coalition,” a “collective of organizations supporting students fighting for Palestinian liberation on university campuses.” The CSC offers “many types of support: whether you’re just starting a chapter and need resources, are facing campus backlash, or need campaign materials, we’re here to help.”¹¹

9. A full list of members of the Campus Support Coalition is not available. But both NSJP and another organization, Palestine Legal, publicly state their involvement.¹² Palestine Legal is funded by the Tides Foundation, a prominent financier of anti-Israel activism.

⁹ *Parizer v. AMP*, ¶ 53-59.

¹⁰ WESPAC (Westchester Peace Action Committee Foundation), NGO Monitor, January 7, 2024. https://www.ngo-monitor.org/ngos/wespac_foundation/

¹¹ “Campus Support Coalition,” National Students for Justice in Palestine. <https://nationalsjp.org/support>

¹² “The Lobby USA: Campus Cut,” Palestine Legal. <https://palestinelegal.org/the-lobby>

10. A review by the Middle East Forum of recent national anti-Israel conferences and a survey of other organizations at SJP-established “encampments” after October 7 indicates consistent collaboration with multiple other national organizations, including but not limited to:

- a. Palestinian Youth Movement
- b. U.S. Campaign for Palestinian Rights
- c. Al-Awda
- d. Jewish Voice for Peace
- e. ANSWER Coalition
- f. Party for Socialism and Liberation
- g. The U.S. Palestinian Community Network
- h. Democratic Socialists of American
- i. Within Our Lifetime

11. WESPAC also finances several of these groups. *See* Appendix I. These organizations may be members of the Campus Support Coalition or, at the very least, all of these organizations (or their local branches) coordinate closely with SJP branches at campuses across the country.¹³

12. As noted in multiple studies of SJP and its allies,¹⁴ these organizations also enjoy financial links and collaboration with dozens of other radical activist groups and community foundations, all emerging from multiple radical Islamist networks, as well as networks with foreign links. The funding they receive is not consistent with appropriate and typical student activism. Rather, it is funneled into SJP and its allies as part of a concerted effort to use college campuses as a breeding ground for anti-Semitic indoctrination and activism of the precise type sought to be better regulated by GA-44.

¹³ People’s Conference on Palestine website. <https://peoplesconferenceforpalestine.org/>

¹⁴ *National Students for Justice in Palestine (NSJP)*, Institute for the Study of Global Anti-Semitism & Policy, 2024. https://isgap.org/wp-content/uploads/2024/05/Student_Justice_Palestine_Report.pdf

I. Pro-Terror Activity Post-October 7th

13. Since October 7, SJP and its partners at encampments on campuses across America have expressed and supported violent anti-Semitic ideas and rhetoric. The Institute for the Study of Global Anti-Semitism & Policy notes:

Since October 7, more SJP rallies and rhetoric actually call for and justify the violence, mutilation, and rape of “colonialist settlers” of Palestinian land, and blame the violence on their presence, which necessitates “resistance” by any means necessary. Some SJP chapters have declared their support for terrorist groups such as Hamas and openly call for the dismantling of Israel as the homeland of the Jewish people. In fact, the SJP Toolkit, released after October 7, 2023, SJP openly declared themselves to be part of the “movement” (which refers to Hamas’ October 7 attacks), and not just supporters.¹⁵

14. Similarly, the Anti-Defamation League reveals:

In the days following Hamas’s October 7, 2023, invasion of Israel, the national leadership of Students for Justice in Palestine (SJP) and many of the organization’s campus chapters explicitly endorsed the actions of Hamas and their armed attacks on Israeli civilians and voiced an increasingly radical call for confronting and ‘dismantling’ Zionism on U.S. college campuses. Some SJP chapters issued pro-Hamas messaging and/or promoted violent anti-Israel messaging channels.

Some SJP chapters, the ADL adds, even shared clips from Hamas’s broadcasts of the October 7 pogrom.¹⁶

15. Popular imagery at SJP protests and encampments have included paragliders, which Hamas used to attack Israeli civilians;¹⁷ as well as an inverted red triangle, a provocative symbol used to indicate support for violence against Israeli military targets. As noted by the ADL, the inverted triangle derives from “propaganda videos promoted by the al-Qassam brigades, the

¹⁵ *National Students for Justice in Palestine (NSJP)*, Institute for the Study of Global Anti-Semitism & Policy, 2024. https://isgap.org/wp-content/uploads/2024/05/Student_Justice_Palestine_Report.pdf

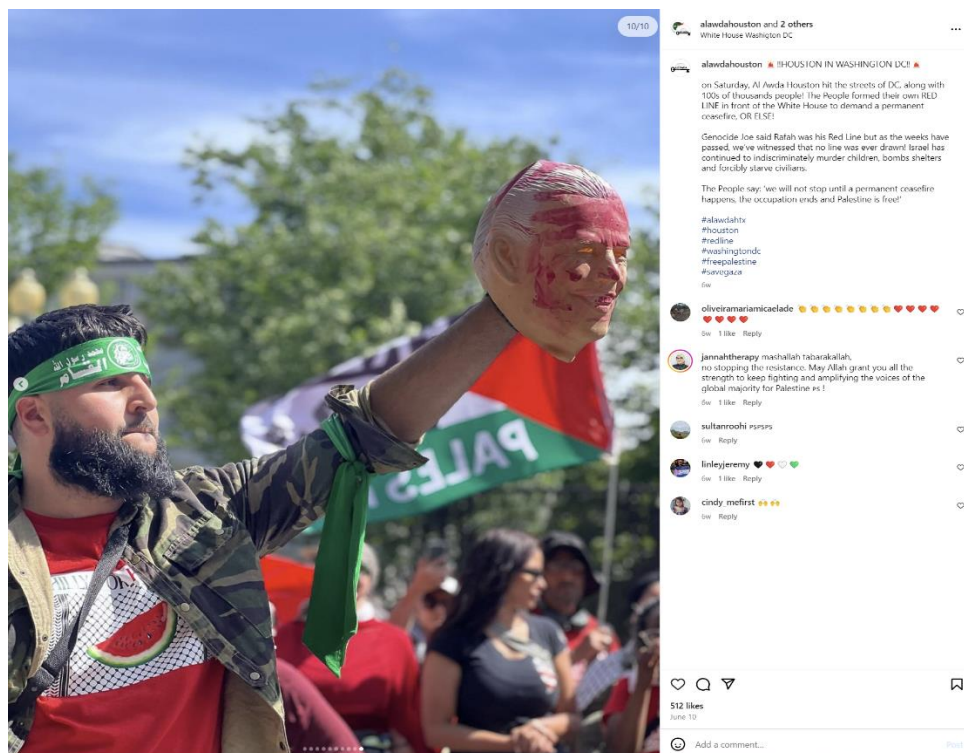
¹⁶ “Students for Justice in Palestine (SJP),” Anti-Defamation League, October 19, 2023. <https://www.adl.org/resources/backgrounders/students-justice-palestine-sjp>

¹⁷ Maggie Hicks, “Pro-Palestinian Student Groups’ Use of This Image Is Drawing Outrage. Here’s Where It Came From,” *Chronicle of Higher Education*, October 11, 2023. <https://www.chronicle.com/article/pro-palestinian-student-groups-use-of-this-image-is-drawing-outrage-heres-where-it-came-from>

military wing of Hamas, which showed footage of Hamas terrorists attacking Israeli military targets indicated with an inverted red triangle.”¹⁸

II. Texas-Specific Activity

16. At the University of Texas (UT Texas) and University of Houston, such violent imagery and radical activism has been evident. Students have reported violent anti-Jewish rhetoric, including death threats.¹⁹ And police at UT Austin reportedly found weapons and literature quoting terrorist groups such as Palestinian Islamic Jihad, as well as violent anti-Jewish incitement.²⁰



A Washington D.C. protest backed and attended by Texas anti-Israel organizations, including SJP, featured Hamas symbols and of a mock severed head of President Biden.

¹⁸ “Inverted Red Triangle,” ADL. <https://extremismterms.adl.org/glossary/inverted-red-triangle>

¹⁹ “If Hamas does not kill you, we will”: Jewish students at UT-Dallas say they’ve dealt with increased antisemitism since start of the Israel-Hamas war,” WFAA, May 8, 2024. <https://www.wfaa.com/article/news/local/if-hamas-does-not-kill-you-we-will-jewish-students-utd-say-theyve-dealt-with-increased-antisemitism-since-start-of-israelhamas-war/287-d85aaab1-57a7-42c8-ac7a-293458faa0c6>

²⁰ “University of Texas anti-Israel encampment sees Hamas propaganda, weapons,” Fox News, May 8, 2024. <https://www.foxnews.com/us/university-texas-anti-israel-encampment-hamas-propaganda-weapons>

17. On May 19, 2024 local SJP branches helped plan a protest at the Texas State Capitol, advertised as a “Nakba Day” that promised “resistance until return,” with posters for the event featuring a masked Palestinian man holding a slingshot weapon.²¹ The protest was organized by members of the Campus Support Coalition in collaboration with local SJP branches; as well as local branches of national Islamist organizations such as the Council on American-Islamic Relations, the Muslim American Society and the Islamic Circle of North America.²²

18. A social media post by the National SJP movement, tagging UT Austin’s Palestine Solidarity Committee (an SJP branch), declares “Fuck the police” and “Globalize the Student Intifada.”²³ Meanwhile, UT Dallas’s SJP branch has expressed support for Houthi terrorists in Yemen,²⁴ and, alongside groups such as the Palestinian Youth Movement, echoes Hamas rhetoric by calling for “support” for the “resistance,” “glory to our martyrs” and “power to our people in Gaza.”²⁵

19. UT Dallas’s SJP appears not only to promote its agenda that encourages anti-Semitism on campus, but does so by suggesting it is a part of a broader anti-Western and anti-American ideal, with social media posts declaring “Never forget that we are fighting for the liberation of not just the Palestinians but colonized peoples across the world — the indigenous peoples whose land was stolen by America, the Black liberation movements, the Kashmiri people, the people of Sudan, the people of Congo, and many more.”²⁶ Organizations supporting the campus

²¹ Nakba Day Poster, Palestinian Youth Movement, Instagram Post, May 3, 2024.

https://www.instagram.com/palestinyouthmovement/p/C6gvUSGgIm/?img_index=1

²² All three of these Islamist organizations have documented ties to designated terrorist organizations and violent foreign extremist movements. See Sam Westrop, “A Guide to Lawful Islamism in the United States,” Focus on Western Islamism, February 1, 2022. <https://islamism.news/research/in-depth-analysis/a-guide-to-lawful-islamism-in-the-united-states/>

²³ Instagram Post, NSJP, May 1, 2024. https://www.instagram.com/p/C6bdJDDu_F3/?hl=en%22

²⁴ Instagram Post, SJP UT-Dallas, January 14, 2024. <https://www.instagram.com/sjputd/p/C2G41CxNqVj>

²⁵ Instagram Post, Palestinian Youth Movement Dallas, May 27, 2024. https://www.instagram.com/p/C7fa00jJ_Ym/

²⁶ Instagram Post, SJP UT-Dallas, December 20, 2023. https://www.instagram.com/sjputd/p/C1F3MtipMpx/?img_index=1

protests, such as Austin Palestine Coalition and Texas for Palestine, attempt to draw parallels between the “colonization” of America and the behavior of the Israeli state, arguing both Americans and Israelis share a desire for “Genocide. Land theft. Ethnic cleansing. ... Just as we fight and organize to reclaim land on Turtle Island (a term for the North America continent, employed by self-described “indigenous rights activists”) our Palestinian relatives fight and organize to return the land and for the land to return to the people.”²⁷

III. Hostile Foreign Links to Texas Encampments

20. Along with the alleged Hamas links to American Muslims for Palestine, multiple local and national organizations involved in establishing and supporting the encampments in Texas universities maintain links with foreign hostile movements and states.

21. Alongside the SJP network, one of the most prominent collections of groups supporting protests and disruptions is linked to the Chinese government. Organizations such as the ANSWER Coalition, Party for Socialism and Liberation, People’s Forum, and others have been identified by both mainstream media and thinktank studies to be part of the “Singham Network ... a global web of nonprofits, fiscal sponsors, and alternative news sources tied to Neville Roy Singham, a known conduit for [Chinese Communist Party] geopolitical influence.”²⁸

22. Singham’s Party for Socialism and Liberation were particularly active in building encampments at the University of Texas and University of Houston.²⁹ For these organizations, anti-Semitism and intimidation of Jewish students may not be their primary purpose but has

²⁷ Instagram Post, Texas for Palestine, July 4, 2024.

https://www.instagram.com/texasforpalestine/p/C9A6_JnpNaG/?img_index=1

²⁸ “Contagious Disruption: How CCP Influence and Radical Ideologies Threaten Critical Infrastructure and Campuses Across the United States,” Network Contagion Research Institute, May 2024.

https://networkcontagion.us/wp-content/uploads/SID4P-Report_May-2024.pdf

²⁹ Instagram Post, Houston PSL, May 8, 2024. <https://www.instagram.com/p/C6tQLQngcMH/> ; Instagram Post PSL DFW, May 1, 2024. <https://www.instagram.com/p/C6cI1eSvkFV/?hl=en>

become a byproduct of their activities on college campuses, crying out for protection by laws such as GA-44.

23. Two other organizations persistently involved with fomenting, instigating and funding campus protests around the country, Al-Awda and Palestinian Youth Movement, were particularly prevalent in Texas encampments.³⁰ Al-Awda officials have openly embraced convicted terrorists.³¹ Its founder, Abbas Hamideh, is openly anti-Semitic and supportive of terror attacks against Israelis;³² as well as a leading American supporter of the designated terrorist organization Hezbollah.³³ The Palestinian Youth Movement (PYM) is closely involved with the Popular Front for the Liberation of Palestine (PFLP), a designated terrorist organization.³⁴

24. In May 2024, PYM, Al-Awda, NSJP, and Singham network groups organized the People's Conference on Palestine, at which terrorists from the PFLP and Palestinian Islamic Jihad were openly lionized.³⁵ At the conference, a Singham network media institution, the Peoples Dispatch, interviewed a UT Dallas encampment organizer and SJP official named Mousa Najjar.³⁶ Meanwhile, speakers at the terror conference included Nidaa Lafi, described as "an organizer with the Palestinian Youth Movement and a former officer with the Students for Justice in Palestine at UT Dallas."³⁷

³⁰ Instagram Page, Al Awda Houston. <https://www.instagram.com/alawdahouston/>; Instagram Page, PYM Dallas. <https://www.instagram.com/pymdallas/>

³¹ Lahav Harkov, "Anti-AIPAC protest organizers Al-Awda have ties to terrorist groups, history of antisemitism," Jerusalem Post, March 5, 2019. <https://www.jpost.com/international/anti-aipac-protest-organizers-al-awda-have-ties-to-terrorist-groups-history-of-antisemitism-582402>

³² Abbas Hamideh, ADL, January 17, 2019. <https://www.adl.org/resources/background/abbas-hamideh>

³³ Twitter Post, Abbas Hamideh, May 25, 2020. <https://twitter.com/Resistance48/status/1264968019773722626>

³⁴ Palestinian Youth Movement, NGO Monitor, June 2, 2024. <https://www.ngo-monitor.org/ngos/palestinian-youth-movement/>

³⁵ "'Fight Until Victory': Speakers & Guests Declare Full Support for Terrorism at 'People's Conference for Palestine,'" ADL, May 31, 2024. <https://www.adl.org/resources/blog/fight-until-victory-speakers-guests-declare-full-support-terrorism-peoples>

³⁶ Natalia Marques, "The global 'student intifada' at the People's Conference for Palestine," Peoples Dispatch, May 31, 2024. <https://peoplesdispatch.org/2024/05/31/the-global-student-intifada-at-the-peoples-conference-for-palestine/>

³⁷ Speaker Bios, People's Conference for Palestine, <https://peoplesconferenceforpalestine.org/speaker-bios>

25. A number of Iranian regime proxies and supporters have been involved with the University of Houston protests. Rise Against Oppression, which participated in the University of Houston encampment,³⁸ is an unabashed support of the Iranian regime. In June, Rise Against Oppression organized the “Imam Khomeini Conference” in Houston, where topics included “Imam Khomeini & the Palestinian Struggle” as well as “Imam Khomeini: A Role Model for the Western Youth.”³⁹ Rise Against Oppression is also involved with radical anti-Israel and anti-Semitic activist efforts such as Shut it Down for Palestine, an initiative of the Singham network, Al-Awda, Democratic Socialists of America, and others.⁴⁰

26. Certain of the most problematic student protests have also enjoyed support from the Muslim Congress,⁴¹ another Texas Shia Islamist organization, and a key Iranian regime voice in the United States. Muslim Congress also works closely with the Palestinian Youth Movement, as well as various organizations from the Singham network, such as the ANSWER Coalition and the Party for Socialism and Liberation.

27. The Houston-based Muslim Congress hosts writings of Ayatollah Khamenei and other regime clerics,⁴² and organizes the regime’s annual “Al-Quds Day,”⁴³ an event in dozens of cities around the world, conceived of and promoted by the Iranian regime, at which marching crowds express support for Hezbollah, another organization designated by the United States as a

³⁸ Instagram Post, Rise Against Oppression, April 21, 2024.

https://www.instagram.com/p/C6CstwJJCj4/?hl=en&img_index=1

³⁹ Instagram Post, Rise Against Oppression, June 11, 2024. <https://www.instagram.com/p/C8FmtXLummT/?hl=en>

⁴⁰ Instagram Post, DSA Houston, April 12, 2024. https://www.instagram.com/p/C5rftIsvVkd/?hl=en&img_index=1

⁴¹ Facebook Post, Muslim Congress, April 28, 2024.

<https://www.facebook.com/MuslimCongress/posts/pfbid0ifTB82CY3ztBuLJyA2wSMU5xnXmehude12bb8cxnynJ4Y5pzfDGJLcp2JygLty5UI>

⁴² “The Letter of Ayatollah Khamenei to Youth in the West,” Muslim Congress, January 28, 2015.

https://web.archive.org/web/20230915000000*/https://muslimcongress.org/wp/the-letter-of-ayatollah-khamenei-to-youth-in-the-west/

⁴³ Facebook Post, Sarah Syed, March 20, 2024.

<https://www.facebook.com/cerafinah/posts/pfbid02x61Xfcogy8RAKTWQmgTgFZXczwt39DqdfOnyKTP8THbHv1U4WYK6zFKoPJ4yLxvAl>

terrorist organization, and call for the eradication of Israel.⁴⁴ In 2024, students from the University of Houston’s SJP branch, alongside activists from the Palestinian Youth Movement, Rise Against Oppression and other organizations,⁴⁵ spoke at the Muslim Congress’s Al-Quds Day event in Houston.⁴⁶

28. At the University of Houston, the Shia Islamist student group, known as the Ahlul Bayt Student Organization, has played a leading role in SJP’s protests and encampments. The group is closely involved with the Islamic Education Center of Houston,⁴⁷ another pro-Iranian regime institution, at which regime propaganda songs are performed;⁴⁸ and from which the Muslim Congress was established.⁴⁹ Branches of the Ahlul Bayt Student movement at University of Texas’s Dallas and Austin campuses have also partnered with SJP.⁵⁰

29. Sunni Islamist organizations have also expressed strong support for Texas encampments. The Islamic Association of North Texas (IANT) emerged as a key outpost for such support, hosting efforts in coordination with SJP aimed at providing assistance to arrested protestors.⁵¹ Counter-terrorism analysts considered IANT in the 1990s to be “one of the most active centers of Hamas activity in the United States.” Today, IANT is closely involved with the Islamic Circle of North America (ICNA), with which it shares officials and runs joint events. ICNA

⁴⁴ “Iran Holds State-Sponsored Nationwide Anti-Israel Rallies,” Iran International, April 5, 2024.

<https://www.iranintl.com/en/liveblog/iranian-holds-state-sponsored-nationwide-anti-israel-rallies>

⁴⁵ Instagram Post, Rise Against Oppression, April 8, 2024. <https://www.instagram.com/p/C5hMffou57q/?hl=en>

⁴⁶ Instagram Post, Rise Against Oppression, April 8, 2024. <https://www.instagram.com/p/C5hGkCuuMXk/?hl=en>

⁴⁷ Search Results from Ahlul Bayt Student Organization Facebook Page.

<https://www.facebook.com/profile/100064909262043/search/?q=IEC>

⁴⁸ Dexter Van Zile, “Texas Mosque Enlists Children into Cult of Iranian Martyrdom,” Focus on Western Islamism, July 29, 2022. <https://islamism.news/news/texas-mosque-enlists-children-into-cult-of-iranian-martyrdom/>

⁴⁹ Jason Brodsky and Moshe Kwiatt, “The Rising Danger of Iranian Soft Power in the United States,” The Dispatch, August 9, 2022. <https://thedispatch.com/article/the-rising-danger-of-iranian-soft/>

⁵⁰ Instagram Post, ABSA UT-Dallas, February 12, 2024.

https://www.instagram.com/p/C3RetyAuZyS/?img_index=1; Instagram Post, Texas ABSO, April 26, 2024.

<https://www.instagram.com/p/C6Oj4UprlTv/>

⁵¹ Facebook Post, Islamic Association of North Texas, July 13, 2024.

<https://www.facebook.com/IANTmasjid/posts/pfbid0XK24yKE6qaSpWsEFsTFfc7wNoJ5wpF8VQc7uW8pf2jvtZFjEfdQbb9g39emhdUw6l>

serves as the U.S. branch of Jamaat-e-Islami, a violent South Asian Islamist movement.⁵² ICNA bodies across America have also participated in the student encampments, including in Texas.⁵³

30. The Council on American-Islamic Relations (CAIR) has also provided support and speakers for the encampments across America. CAIR's roots are in Hamas and the Muslim Brotherhood. The group has evolved to advance Islamist and anti-Semitic ideological agendas.⁵⁴ In Texas, such radicalism is apparent in local CAIR branches, which have supported the University of Texas and Houston encampments. In 2021, CAIR's chief Texas branch, along with other encampment supporters such as the Muslim American Society, ICNA, and American Muslims for Palestine, hosted an event for the convicted terrorist Aafia Siddiqui, a major "al Qaeda operative and facilitator," according to the federal government.⁵⁵

IV. **Funding**

31. There is little **public** evidence so far in Texas to indicate campus protestors were directly financed by outside national organizations. Supplies and legal funds were initially solicited through social media, using Venmo accounts and other donation platforms.⁵⁶ However, SJP branches have previously credited NSJP with providing "resources."⁵⁷

32. While direct funding for Texas student associations is not extensively apparent, the key national organizations behind these branches and initiatives, such as Palestine Legal, Al-

⁵² Sam Westrop, "A South Asian Threat in America," Morning Consult, March 7, 2019. <https://morningconsult.com/opinions/a-south-asian-threat-in-america/>

⁵³ Instagram Post, ICNA Houston, May 8, 2024. <https://www.instagram.com/p/C6tLwIPMnG4/>

⁵⁴ Sam Westrop, "A Guide to Lawful Islamism in the United States," Focus on Western Islamism, February 1, 2022. <https://islamism.news/research/in-depth-analysis/a-guide-to-lawful-islamism-in-the-united-states/>

⁵⁵ Sam Westrop, "Exploiting Progressivist Handwringing, Islamists Advocate for their Own," National Review, September 13, 2021. <https://www.nationalreview.com/2021/09/islamists-exploit-western-progressives-hand-wringing-to-support-their-own/>

⁵⁶ Instagram Comment, SJP UT-Dallas, May 2, 2024. <https://www.instagram.com/p/C6d5YQILFuw/c/18063301060483393/?hl=en>

⁵⁷ Instagram Post, SJP Houston and SJP UT-Dallas, August 16, 2022. https://www.instagram.com/sjphtx/p/ChVyL_Cu3Zw/?img_index=1

Awda, American Muslims for Palestine and NSJP and PYM's fiscal sponsor WESPAC, receive millions of dollars through the 501c system. *See* Appendix I. Very little direct funding to NSJP or SJP is apparent in 501c tax return data, however.

33. SJP branches,⁵⁸ along with Sunni and Shia Islamists,⁵⁹ have been particularly keen on soliciting donations from students to Baitulmaal, an Irving, Texas charity long accused of ties to terror. Indeed, Baitulmaal openly funds Hamas proxies in Gaza, such as the Yazour Charitable Association, which Hamas media has confirmed is “affiliated” with the terrorist group; and the Generosity Without Limit Association, whose officials include members of Hamas's various “Popular Resistance Committees.” Baitulmaal is run by Mazen Mokhtar, a former fundraiser for the Taliban and other jihadist groups.⁶⁰

34. SJP branches have also solicited donations for Islamic Relief, a global charitable institution for the Ikhwan Al-Muslimeen, better known as the Muslim Brotherhood. In recent years, European and Islamic governments have denounced the notoriously anti-Semitic Islamic Relief because of the extremism of its officials and its long-reported history of close ties to Hamas and the Muslim Brotherhood. The Egyptian, Emirati and Tunisian governments have accused Islamic Relief of financing jihadists. Following a British media furor over Islamic Relief officials' extremism, in 2020, the U.S. State Department warned about the “blatant and horrifying anti-

⁵⁸ Instagram Post, Texas MSA, February 26, 2024. <https://www.instagram.com/p/C30bkbrAaju/?hl=en>; Instagram Post, Linktree, SJP Houston. <https://linktr.ee/sjphouston>

⁵⁹ Instagram Post, Ahlul Bayt Student Organization and SJP UT-Dallas, March 26, 2023. <https://www.instagram.com/p/CqR2YusufWX/>

⁶⁰ Sam Westrop, “The U.S. Charitable Network That Subsidizes Hamas, and the Donors Behind It,” Focus on Western Islamism, November 14, 2023. <https://islamism.news/research/investigations/revealed-the-funding-behind-the-u-s-charitable-network-that-subsidizes-hamas/>

Semitism and glorification of violence exhibited at the most senior levels of Islamic Relief Worldwide.”⁶¹

CONCLUSION

35. It is within the purview and the power of state government to regulate discriminatory and harassing conduct, even if that conduct manifests itself as speech. *See Wisconsin v. Mitchell*, 508 U.S. 476, 489 (1993). Executive Order No. GA-44 was enacted for that very purpose; due to dangerous, ongoing and increasing instances of threats, intimidation and anti-Semitic conduct on Texas public university campuses, in violation of Title VI of the Civil Rights Act of 1964. By ordering that Texas institutions of higher education adopt the definition of anti-Semitism promulgated by the International Holocaust Remembrance Alliance and adopted by the State of Texas in Section 448.001 of the Texas Government Code, the state of Texas has created a mechanism to protect First Amendment rights on campus, while simultaneously ensuring the safety, security and proper anti-discriminatory freedom of expression of all students. There is a line between unregulated freedom of expression and anti-Semitism that can be crossed. It is the government’s role and function to ensure that line is protected. In light of the above, and given the legitimate and recognized purpose of the definition of anti-Semitism as adopted by Executive Order No. GA-44, it is the position of MEF that Plaintiffs’ Motion for Preliminary Injunction should be denied, and their amended complaint dismissed.

⁶¹ Sam Westrop, “Why has the Islamic Relief Franchise Lost the Support of Western Governments?,” Focus on Western Islamism, September 25, 2023. <https://islamism.news/research/investigations/why-has-the-islamic-relief-franchise-lost-the-support-of-western-governments/>

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Respectfully Submitted:

DOW GOLUB REMELS & GILBREATH, PLLC

/s/ Keith M. Remels

Keith M. Remels
Texas Bar Number 16765800
2700 Post Oak Blvd., Suite 1750
Houston, Texas 77056
Kremels@dowgolub.com
713.526.3700

BERG PLUMMER
& JOHNSON, LLP

By: /s/ Geoffrey Berg

Geoffrey Berg
Texas Bar No. 00793330
3700 Buffalo Speedway, Suite 1150
Houston, Texas 77098
gberg@bergplummer.com
713-526-0200 (tel)
832-615-2665 (fax)

OF COUNSEL:

STEIN SPERLING BENNETT DE JONG DRISCOLL PC

Jeffrey M. Schwaber
jschwaber@steinsperling.com
Deanna L. Peters
dpeters@steinsperling.com
1101 Wootton Parkway, Suite 700
(301) 340-2020

Attorneys for Middle East Forum

**APPENDIX I: 990 FUNDING DATA FOR KEY SUPPORTERS OF ANTI-ISRAEL
ENCAMPMENT ORGANIZERS**

Grantor	Grantor EIN	Tax Year	Grantee	Grant Amount	Purpose of Grant
FIREROLL FOUNDATION	943301999	2021	1109 PALESTINE LEGAL - TIDES CENTER	25000	PALESTINE LEGAL SUPPORT
Hope and Justice Educational Foundation	451066280	2014	Al-Awda PPRC	1500	To provide financial support.
NATL CHRISTIAN CHARITABLE FDN INC NATIONAL CHRISTIAN FDN	581493949	2018	AL-AWDA THE PALESTINE RIGHT TO RETURN COALITION	1000	POVERTY
PACIFICA FOUNDATION	204733627	2013	Brown University	1650	Students for Justice in Palestine
THE CALIFORNIA ENDOWMENT	954523232	2017	ISLAH	25000	PALESTINIAN YOUTH MOVEMENT - STRENGTHENING REFUGEE YOUTH HEALTH: TO PROMOTE HEALTH AND WELLNESS THROUGH YOUTH DEVELOPMENT, MENTORING, THE ARTS, CROSS-CULTURAL COMMUNITY BUILDING, SOCIAL JUSTICE EDUCATION AND COMMUNITY ACTIVISM WITHIN SAFE AND SUPPORTIVE SPACES FOR ARAB IMMIGRANT AND REFUGEE YOUTH IN SAN DIEGO.
THE SALEM FAMILY FOUNDATION INC	263476718	2016	PALESTINE LEGAL	5000	SUPPORT OF SEC. 501(C)(3) ORGANIZATION
OHRSTROM FOUNDATION INC C/O PKF O'CONNOR DAVIES LLP	546039966	2019	PALESTINE LEGAL	10000	GENERAL OPERATING SUPPORT
BERGER FAMILY FOUNDATION	472357665	2020	PALESTINE LEGAL	2500	CHARITABLE PURPOSE OF ORGANIZATION
MAXIMUM DIFFERENCE FOUNDATION	331127669	2021	PALESTINE LEGAL	35000	GENERAL SUPPORT
THE SPARKPLUG FOUNDATION	331033952	2019	PALESTINE LEGAL	5000	GENERAL SUPPORT
The Shana Alexander Charitable Foundation	204227171	2021	PALESTINE LEGAL	500	UNRESTRICTED GRANT FOR DONEES EXEMPT PURPOSE
ALALUSI FOUNDATION	912158518	2021	PALESTINE LEGAL	5000	HUMANITARIAN AND CHARITABLE ASSISTANCE
THE SALEM FAMILY FOUNDATION INC	263476718	2015	PALESTINE LEGAL	5000	SUPPORT OF SEC. 501(C)(3) ORGANIZATION
KIBLAWI FOUNDATION	263899795	2022	PALESTINE LEGAL	5000	GENERAL OPERATION
NATL CHRISTIAN CHARITABLE FDN INC NATIONAL CHRISTIAN FDN	581493949	2018	PALESTINE LEGAL (TIDES CENTER)	5000	JUSTICE
ARC OF JUSTICE	841618483	2022	PALESTINE LEGAL TIDES	20000	GENERAL SUPPORT

ARC OF JUSTICE	841618483	2020	PALESTINE LEGAL TIDES	10000	GENERAL SUPPORT
THE SALEM FAMILY FOUNDATION INC	263476718	2018	Palestine Legal Tides Center	1000	SUPPORT OF SEC. 501(C)(3) ORGANIZATION
PACIFICA FOUNDATION	204733627	2018	TIDES CENTER	2500	PALESTINE LEGAL
PACIFICA FOUNDATION	204733627	2019	TIDES CENTER	2500	PALESTINE LEGAL
LANNAN FOUNDATION	366062451	2020	TIDES CENTER	400	PALESTINE LEGAL
MAXIMUM DIFFERENCE FOUNDATION	331127669	2022	TIDES CENTER	50000	GENERAL SUPPORT FOR PALESTINE LEGAL
LANNAN FOUNDATION	366062451	2022	TIDES CENTER	125000	PALESTINE LEGAL
ROCKEFELLER BROTHERS FUND INC	131760106	2022	TIDES CENTER	75000	FOR ITS PROJECT, PALESTINE LEGAL
ROCKEFELLER BROTHERS FUND INC	131760106	2020	TIDES CENTER	75000	FOR ITS PALESTINE LEGAL PROJECT
ROCKEFELLER BROTHERS FUND INC	131760106	2021	TIDES CENTER	75000	FOR ITS PROJECT, PALESTINE LEGAL
LANNAN FOUNDATION	366062451	2020	TIDES CENTER	100000	PALESTINE LEGAL
Solidaire Network Inc	842130536	2022	Tides Center	55000	General Support for 501(c)(3) activities for Palestine Legal
LANNAN FOUNDATION	366062451	2021	TIDES CENTER	125000	PALESTINE LEGAL
THE MORRISON & FOERSTER FOUNDATION	943006979	2022	TIDES CENTER	15500	1488 THE MARIA FUND - FIONA COMMUNITY RESPONSE FUND, 1448 THE LAWYERING PROJECT, PALESTINE LEGAL
THE SHANA ALEXANDER CHARITABLE FNDTN	204227171	2018	TIDES CENTER - PALESTINE LEGAL	500	UNRESTRICTED GRANT FOR DONEES EXEMPT PURPOSE
THE SPARKPLUG FOUNDATION	331033952	2019	TIDES CENTER - PALESTINE LEGAL	10000	GENERAL SUPPORT
THE SHANA ALEXANDER CHARITABLE FNDTN	204227171	2017	TIDES CENTER - PALESTINE LEGAL	500	UNRESTRICTED GRANT FOR DONEES EXEMPT PURPOSE
Padosi Foundation	473227718	2016	Tides Center - Palestine Legal	12000	TO PROTECT THE RIGHTS OF PEOPLE IN THE U.S. WHO SPEAK OUT FOR PALESTINIAN FREEDOM
PADOSI FOUNDATION	473227718	2017	TIDES CENTER - PALESTINE LEGAL	10000	TO PROTECT THE RIGHTS OF PEOPLE IN THE U.S. WHO SPEAK OUT FOR PALESTINIAN FREEDOM
CHARLES MOSESAN FAMILY FOUNDATION	222859862	2022	TIDES CENTER - PALESTINE LEGAL	500	PROGRAM SUPPORT
ARAB COMMUNITY CENTER FOR ECONOMIC AND SOCIAL SERVICES ACCESS	237444497	2021	TIDES CENTER - PALESTINE LEGAL	20000	DONOR DIRECT FUND DISTRIBUTION

PADOSI FOUNDATION	473227718	2020	TIDES CENTER - PALESTINE LEGAL	40000	TO PROTECT THE RIGHTS OF PEOPLE IN THE U.S. WHO SPEAK OUT FOR PALESTINIAN FREEDOM
PADOSI FOUNDATION	473227718	2018	TIDES CENTER - PALESTINE LEGAL	20000	TO PROTECT THE RIGHTS OF PEOPLE IN THE U.S. WHO SPEAK OUT FOR PALESTINIAN FREEDOM
FIRE DOLL FOUNDATION	943301999	2022	TIDES CENTER 1109 PALESTINE LEGAL	25000	PALESTINE LEGAL SUPPORT
IMPACTASSETS INC	262048480	2022	TIDES CENTER FBO PALESTINE LEGAL	15000	GENERAL SUPPORT
Solidaire Network Inc	842130536	2020	Tides Center for Palestine Legal	80000	General Support for 501c3 activities for Palestine Legal
BERGER FAMILY FOUNDATION	472357665	2022	Tides Center Palestine Legal	2500	For Charitable Purpose of Organization
CARL LESNOR FAMILY FOUNDATION	461611644	2022	TIDES CENTER PALESTINE LEGAL	32000	TO SUPPORT THE DEVELOPMENT OF LEGAL INTERNSHIP PROGRAM
CARL LESNOR FAMILY FOUNDATION	461611644	2019	TIDES CENTER PALESTINE LEGAL	30000	TO SUPPORT THE DEVELOPMENT OF LEGAL INTERNSHIP PROGRAM
CARL LESNOR FAMILY FOUNDATION	461611644	2017	TIDES CENTER PALESTINE LEGAL	28000	TO SUPPORT THE DEVELOPMENT OF LEGAL INTERNSHIP PROGRAM
FIRE DOLL FOUNDATION	943301999	2018	TIDES CENTER PALESTINE LEGAL	20000	GENERAL SUPPORT
CARL LESNOR FAMILY FOUNDATION	461611644	2020	TIDES CENTER PALESTINE LEGAL	30000	TO SUPPORT THE DEVELOPMENT OF LEGAL INTERNSHIP PROGRAM
CARL LESNOR FAMILY FOUNDATION	461611644	2018	TIDES CENTER PALESTINE LEGAL	25000	TO SUPPORT THE DEVELOPMENT OF LEGAL INTERNSHIP PROGRAM
FIRE DOLL FOUNDATION	943301999	2019	TIDES CENTER PALESTINE LEGAL	45000	PALESTINE LEGAL SUPPORT
CARL LESNOR FAMILY FOUNDATION	461611644	2021	TIDES CENTER PALESTINE LEGAL	30000	TO SUPPORT THE DEVELOPMENT OF LEGAL INTERNSHIP PROGRAM
ARAB COMMUNITY CENTER FOR ECONOMIC AND SOCIAL SERVICES ACCESS	237444497	2019	TIDES CENTER- PALESTINE LEGAL	10000	DONOR DIRECT FUND DISTRIBUTION
Network for Good	680480736	2014	Tides Center Palestine Solidarity Legal Support	5862	Unrestricted
MAXIMUM DIFFERENCE FOUNDATION	331127669	2018	TIDES CENTER- PALESTINE SOLID LEGAL	7500	ADVANCE PROGRESSIVE POLICY
MAXIMUM DIFFERENCE FOUNDATION	331127669	2017	TIDES CENTER- PALESTINE SOLID LEGAL	65000	ADVANCE PROGRESSIVE POLICY
MAXIMUM DIFFERENCE FOUNDATION	331127669	2019	TIDES CENTER- PALESTINE SOLID LEGAL	12500	ADVANCE PROGRESSIVE POLICY
SAM K HINDY FOUNDATION INC	823042758	2021	TIDES CTR PALESTINE LEGAL	2000	SUPPORT OF ORGANIZATION'S PROGRAM
SAM K HINDY FOUNDATION INC	823042758	2019	TIDES CTR PALESTINE LEGAL	1000	SUPPORT OF ORGANIZATION'S PROGRAM

SAM K HINDY FOUNDATION INC	823042758	2020	TIDES CTR PALESTINE LEGAL	500	SUPPORT OF ORGANIZATION'S PROGRAM
THE VIOLET JABARA CHARITABLE TRUST C/O STEVEN J WOHL ESQ	137560427	2019	TIDES FOUNDATION	15000	TO SUPPORT THE PALESTINE LEGAL CHICAGO FOR PRODUCING REPORT.
THE SPARKPLUG FOUNDATION	331033952	2018	TIDES FOUNDATION	10000	PALESTINE LEGAL
MILTON A & CHARLOTTE R KRAMER CHARITABLE FOUNDATION	341467089	2022	WESPAC	1000	PROGRESSIVE SOCIAL CHANGE
THE SPARKPLUG FOUNDATION	331033952	2015	WESPAC - Freedom Food Alliance	15000	Funds will help us formalize our alliance of farmers, organizers, students, prisoners and prison families and purchase a green vehicle that will provided transportation and food to familiesfriend of people incarcerated.
THE SPARKPLUG FOUNDATION	331033952	2015	WESPAC - IJAN	4000	IJAN would use Sparkplug funding to print and tour our just released and highly acclaimed 120 page report, The Business of Backlash: The Attack on the Palestinian and Other Movements for Justice, and to complete and print an accessible primer on the politics and history of Jewish anti-Zionism.
THE SPARKPLUG FOUNDATION	331033952	2022	WESPAC - NATIONAL STUDENTS FOR JUST	20000	GENERAL SUPPORT
THE SPARKPLUG FOUNDATION	331033952	2015	WESPAC - Palestinian Youth Movement	12000	This summer, PYM will host the first ever "Youth Leadership Summer School: Palestinian and Arab Youth Transforming Theory into Practice." The school is a seven day long intensive program in Riverside, CA and includes political education, cultural empowerment and organizational training.
THE SPARKPLUG FOUNDATION	331033952	2015	WESPAC - Transforming Lives	6000	A program created by three inmates at Eastern Prison to help other inmates get in rehabilitation and journal about it so that they have a record of their activities when they go before the parole board and then go for jobs. Currently rehab is not happening, for most, because of prison politics.
Greater Washington Community Foundation	237343119	2022	Wespac Fdn Inc	20000	General Support
KIBLAWI FOUNDATION	263899795	2022	WESPAC FOR NAT'L STUDENTS FOR JUSTICE	500	GENERAL OPERATION
ELIAS FOUNDATION	134092287	2019	WESPAC FOUNDATION	40000	10K SOCIAL FORUM \$30K GENERAL OPERATING
ELIAS FOUNDATION	134092287	2019	WESPAC FOUNDATION	2000	GENERAL OPERATING-GALA
COMMON COUNSEL FOUNDATION	943214166	2022	WESPAC FOUNDATION	35000	PROJECT SUPPORT FOR SWEET FREEDOM FARM

NATIONAL DAY LABORER ORGANIZING NETWORK	208802586	2022	WESPAC Foundation	22000	Support
MILTON A & CHARLOTTE R KRAMER CHARITABLE FOUNDATION	341467089	2019	WESPAC FOUNDATION	2000	ADVOCACY FOR SOCIAL CHANGE
THE BAFRAYUNG FUND	832811578	2022	WESPAC FOUNDATION	20000	PALESTINIAN YOUTH MOVEMENT
SAMIR AND GRACE TUMA FOUNDATION	472654347	2017	WESPAC FOUNDATION	200	FOR OPERATIONS SUPPORT - 2017 SUMMER SCHOOL
THE SPARKPLUG FOUNDATION	331033952	2018	WESPAC FOUNDATION	10000	US PALESTINIAN COMMUNITY NETWORK-USPCN
THE VIOLET JABARA CHARITABLE TRUST C/O STEVEN J WOHL ESQ	137560427	2017	WESPAC FOUNDATION	15000	TO EDUCATE, AGITATE AND ORGANIZE FOR A MORE JUST AND PEACEFUL WORLD, AN END TO MILITARISM AND RACISM AND A MORE FAIR ECONOMY THAT WORKS FOR ALL.
NATL CHRISTIAN CHARITABLE FDN INC NATIONAL CHRISTIAN CHARITABLE FDN	581493949	2014	WESPAC FOUNDATION	1000	SOCIAL, CIVIC AND PUBLIC POLICY
ELIAS FOUNDATION	134092287	2020	WESPAC FOUNDATION	3500	FOOD PROGRAM GENERAL OPERATING
PACIFICA FOUNDATION	204733627	2014	Wespac Foundation	500	LEAP
PACIFICA FOUNDATION	204733627	2019	WESPAC FOUNDATION	1000	LEAP
MAXIMUM DIFFERENCE FOUNDATION	331127669	2015	WESPAC FOUNDATION	10000	SUPPORT WESTCHESTER COMMUNITY
THE SPARKPLUG FOUNDATION	331033952	2020	WESPAC Foundation	15000	general support of Adalah-NY
ELIAS FOUNDATION	134092287	2021	WESPAC FOUNDATION	5000	GENERAL OPERATING
THE SPARKPLUG FOUNDATION	331033952	2015	WESPAC Foundation	300	general support of Adalah-NY
PACIFICA FOUNDATION	204733627	2013	Wespac Foundation	500	LEAP
Hope and Justice Educational Foundation	451066280	2015	WESPAC Foundation	500	To provide financial support.
Hope and Justice Educational Foundation	451066280	2014	WESPAC Foundation	1000	To provide financial support.
OPEN SOCIETY INSTITUTE	137029285	2012	WESPAC Foundation	20700	Matching Gifts
UNITED WAY OF WESTCHESTER AND PUTNAM INC	131997636	2013	WESPAC FOUNDATION		CONSTITUENCY SERVICES
PACIFICA FOUNDATION	204733627	2013	Wespac Foundation	500	NISCVT winterization

THE HARTMAN FAMILY FOUNDATION	357103482	2017	WESPAC FOUNDATION	160	CIVIC & RELIGIOUS ADVOCATION
THE SPARKPLUG FOUNDATION	331033952	2013	WESPAC Foundation	5000	general support of Adalah-NY
PAYPAL Charitable Giving Fund	450931286	2022	WESPAC Foundation	38778	GENERAL SUPPORT
THE SPARKPLUG FOUNDATION	331033952	2014	WESPAC Foundation	20400	general support of Adalah-NY
COMMON COUNSEL FOUNDATION	943214166	2021	WESPAC FOUNDATION	25000	PROJECT SUPPORT FOR SWEET FREEDOM FARM
PACIFICA FOUNDATION	204733627	2016	Wespac Foundation	1000	LEAP
EL-GAOUNY & LEE FOUNDATION	854018679	2022	WESPAC FOUNDATION	5000	CHARITABLE CONTRIBUTION
THE SPARKPLUG FOUNDATION	331033952	2017	WESPAC Foundation	5000	general support of Adalah-NY
ELIAS FOUNDATION	134092287	2021	WESPAC FOUNDATION	50000	GENERAL OPERATING
MARION AND HUGH OAKLEY FAMILY FOUNDATION INC	527030006	2023	WESPAC FOUNDATION	950	EDUCATE FOR A MORE PEACEFUL WORLD
GRASSROOTS INTERNATIONAL INC	42791159	2019	WESPAC FOUNDATION	10000	INT'L LAW/HUMAN RIGHTS
ELIAS FOUNDATION	134092287	2022	WESPAC FOUNDATION	60000	GENERAL OPERATING
ALALUSI FOUNDATION	912158518	2022	WESPAC FOUNDATION	6300	HUMANITARIAN AND CHARITABLE ASSISTANCE
EL-GAOUNY & LEE FOUNDATION	854018679	2021	WESPAC FOUNDATION	3000	CHARITABLE CONTRIBUTION
PACIFICA FOUNDATION	204733627	2018	WESPAC FOUNDATION	1000	LEAP
THE SPARKPLUG FOUNDATION	331033952	2012	WESPAC Foundation	5000	support a cross-movement delegation to the World Social Forum Free Palestine in Brazil to build joint struggle between US grassroots movements and the Palestinian grassroots movement.
CITIZENS CHARITABLE FOUNDATION	202302039	2022	WESPAC FOUNDATION INC	200	MATCHING GIFT
MORGAN STANLEY GLOBAL IMPACT FUNDING TRUST INC	527082731	2020	WESPAC FOUNDATION INC	50000	UNRESTRICTED GENERAL SUPPORT
AMALGAMATED CHARITABLE FOUNDATION INC	821517696	2022	WESPAC FOUNDATION INC	13000	GENERAL OPERATING SUPPORT
FIDELITY INVESTMENTS CHARITABLE GIFT FUND	110303001	2016	WESPAC FOUNDATION INC	6000	For grant recipient's exempt purposes
VOS FAMILY FOUNDATION	770440191	2023	WESPAC FOUNDATION INC	5000	IN FURTHERANCE OF 501(C)(3) EXEMPT PURPOSE.

Groundswell Fund	474003615	2017	WESPAC Foundation Inc	12500	
MORGAN STANLEY GLOBAL IMPACT FUNDING TRUST INC	527082731	2021	WESPAC FOUNDATION INC	50000	UNRESTRICTED GENERAL SUPPORT
Network for Good	680480736	2018	WESPAC FOUNDATION INC	31060	Unrestricted
Cultures of Resistance Network Foundation	203587464	2018	WESPAC FOUNDATION INC	5000	General & Unrestricted
TIDES CENTER	943213100	2022	WESPAC FOUNDATION INC	35000	EQUITY, HUMAN RIGHTS, AND ECONOMIC EMPOWERMENT
Cultures of Resistance Network Foundation	203587464	2018	WESPAC FOUNDATION INC	1000	Beit Atfal Assumoud
THE COMMUNITY FOUNDATION FOR GREATER ATLANTA INC	581344646	2020	WESPAC FOUNDATION INC	15000	CIVIL RIGHTS/SOCIAL ACTION/ADVOCACY
FIDELITY INVESTMENTS CHARITABLE GIFT FUND	110303001	2021	WESPAC FOUNDATION INC	17000	For grant recipient's exempt purposes
Groundswell Fund	474003615	2021	WESPAC Foundation Inc	20000	Program Support
Network for Good	680480736	2019	WESPAC FOUNDATION INC	16805	Unrestricted
ROCKEFELLER PHILANTHROPY ADVISORS INC	133615533	2022	WESPAC FOUNDATION INC	90000	GENERAL
TIDES FOUNDATION	510198509	2022	WESPAC FOUNDATION INC	97000	HEALTHY INDIVIDUALS AND COMMUNITIES
FIDELITY INVESTMENTS CHARITABLE GIFT FUND	110303001	2019	WESPAC FOUNDATION INC	7425	For grant recipient's exempt purposes
ROCKEFELLER PHILANTHROPY ADVISORS INC	133615533	2021	WESPAC FOUNDATION INC	80000	GENERAL
RACE FORWARD	942759879	2022	WESPAC FOUNDATION INC	10000	TO SUPPORT ADVANCEMENT OF RACIALLY EQUITABLE POLICY ON IMMIGRATION AND CRIMINAL JUSTICE
Eutopia Foundation	473998424	2022	WESPAC FOUNDATION INC	550000	General & Unrestricted
AMAZONSMILE FOUNDATION	462626883	2022	WESPAC FOUNDATION INC	11	GENERAL SUPPORT
AMAZONSMILE FOUNDATION	462626883	2020	WESPAC FOUNDATION INC	18	GENERAL SUPPORT
MUTUAL OF AMERICA FOUNDATION	133443360	2016	WESPAC FOUNDATION INC	5000	MATCHING GIFT TO IRC SEC. 501 (C) (3) ORGANIZATION
AMAZONSMILE FOUNDATION	462626883	2021	WESPAC FOUNDATION INC	16	GENERAL SUPPORT

AMERICAN ENDOWMENT FOUNDATION	341747398	2016	WESPAC FOUNDATION INC	5685	PROGRAMS
THE BAFRAYUNG FUND	832811578	2020	WESPAC FOUNDATION PYM	15000	GENERAL OPERATING
THE BAFRAYUNG FUND	832811578	2021	WESPAC FOUNDATION PYM	15000	GENERAL OPERATING
THE DILMAGHANI FOUNDATION	136159975	2014	WESPAC FOUNDATIONINC	6000	AN UNRESTRICTED CONTRIBUTION TO ASSIST THEM WITH THEIR ACTIVITIES
THE DILMAGHANI FOUNDATION	136159975	2013	WESPAC FOUNDATIONINC	5000	AN UNRESTRICTED CONTRIBUTION TO ASSIST THEM WITH THEIR ACTIVITIES
Amin & Rubina Chikhalia Foundation	836310899	2019	American Muslim for Palestine	100	Charitable Contribution
THE DFL FOUNDATION	260900879	2015	AMERICAN MUSLIMS FOR PALESTINE	500	CHARITY
Amin & Rubina Chikhalia Foundation	836310899	2022	AMERICAN MUSLIM FOR PALESTINE	100	GIFT
THE FARHAN FOUNDATION	383533248	2011	AMERICAN MUSLIM- PALESTINE	500	CHRITABLE
BARZINJI FAMILY FOUNDATION	462035823	2018	AMERICAN MUSLIMS FOR PALESTINE	5000	PROGRAM SUPPORT - COMMUNITY SERVICES
ALALUSI FOUNDATION	912158518	2022	AMERICAN MUSLIMS FOR PALESTINE	3000	HUMANITARIAN AND CHARITABLE ASSITANCE
THE DFL FOUNDATION	260900879	2016	AMERICAN MUSLIMS FOR PALESTINE	500	CHARITY
THE BENJAMIN FUND INC	841618483	2016	AMERICAN MUSLIMS FOR PALESTINE	3500	GENERAL SUPPORT
BARZINJI FAMILY FOUNDATION	462035823	2020	AMERICAN MUSLIM FOR PALESTINE	10000	PROGRAM SUPPORT - SOCIAL/HUMANITARIAN SERVICES
Amin & Rubina Chikhalia Foundation	836310899	2021	AMERICAN MUSLIM FOR PALESTINE	100	Gift
THE LIGHT OF HOPE FOUNDATION	300069735	2015	AMERICAN MUSLIM FOR PALESTINE (AMP)	1000	CHARITY
BARZINJI FAMILY FOUNDATION	462035823	2021	AMERICAN MUSLIM FOR PALESTINE	5000	PROGRAM SUPPORT - SOCIAL/HUMANITARIAN SERVICES